

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:)
)
PAMELA SUE COWAN) CASE NO. 13-07485-JJG-13
)
)
DEBTOR)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Comes now the Debtor, Pamela Sue Cowan, by counsel, and objects to the Trustee's Motion to Dismiss, and in support whereof shows the Court as follows:

1. Due to circumstances beyond the control of the Debtor, payments to the Trustee are currently in arrears; however, the Debtor intends to become current on payments to the Trustee on or before the hearing date.

WHEREFORE, the Debtor, by counsel, respectfully requests a hearing to present evidence and testimony in support of the assertion that the Trustee's Motion should be overruled.

By: /s/ Andrew Sawin
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Attorneys for Debtor(s)
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on the following parties through the Court's Electronic Case Filing System or by first-class U.S. Mail, postage prepaid:

U.S. Trustee

Ch 7/13 Trustee

July 22, 2016

/s/ Andrew Sawin